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Of Attorneys for Patenaude & Felix, A.P.C.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BRIAN CARLOS, on behalf of himself and
all other similarly situated,

Plaintiff,

v.

PATENAUDE & FELIX, A.P.C.,

Defendants.

Case No. 3:14-cv-00921-MO

**DEFENDANT'S OFFER TO ALLOW
JUDGMENT**

Pursuant to Fed. R. Civ. P. 68, Defendant Patenaude & Felix, A.P.C. hereby offers to allow judgment to be given against it and in favor of plaintiff as to Count IV of plaintiff's Complaint only. Defendant offers judgment as follows: \$1,000 in statutory damages pursuant to 15 U.S.C. 1692k and for reasonable attorney fees and costs as determined by the Court pursuant to Fed. R. Civ. P. 54 and 15 U.S.C. 1692k. Additionally, defendant offers judgment of \$1,349.83 for all actual damages arising from Count IV of plaintiff's Complaint only.

This offer of judgment applies to Count IV only. In accepting this offer of judgment, plaintiff expressly reserves the right to pursue an appeal of the Court's order on defendant's motions for summary judgment as to Counts I, II and III of plaintiff's Complaint, and the Court's denial of plaintiff's motion to certify a class. Upon acceptance of this offer, plaintiff requests the

Court enter final judgment reflecting the Court's order on defendant's motions for summary judgment and its denial of plaintiff's motion to certify a class.

DATED this 29th day of October, 2015.

KEATING JONES HUGHES, P.C.

s/ Peter Eidenberg

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Of Attorneys for Patenaude & Felix, A.P.C.

Defendant's Offer to Allow
Judgment is hereby ACCEPTED:



Brian K. Carlos
Plaintiff

DATE APPROVED: 11/3/2015

s/ Bret Knewton

Bret Knewton, OSB No. 033553

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